

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
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In Re:

GEORGE SARIOS and
CINDY SARIOS,

Debtors.

Case No.: 22-12916

Chapter 11

Judge: Michael B. Kaplan

Hearing Date: 5/5/2022

**MOTION PURSUANT TO SECTIONS 105(A) AND 363 OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 6004 FOR AN
ORDER AUTHORIZING THE SALE OF DEBTORS' INTEREST IN REAL
PROPERTY COMMONLY KNOWN AS 61 REDWOOD DRIVE, MONMOUTH
COUNTY, NEW JERSEY FREE AND CLEAR OF LIENS WITH VALID LIENS
TO ATTACH TO PROCEEDS OF SALE**

TO: ALL PARTIES ON THE ANNEXED SERVICE LIST

PLEASE TAKE NOTICE that, the undersigned attorneys for the debtor will move on Thursday, May 5, 2022 at 10 a.m. in the forenoon, before The Honorable Michael B. Kaplan, U. S. Bankruptcy Judge, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608 for an Order Permitting and Authorizing the Debtor to sell real property located at 61 Redwood Drive, Ocean Township, Monmouth County, New Jersey 07712 free and clear of certain liens, claims and encumbrances, with valid liens to attach to proceeds of sale.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Application in support of said Motion.

PLEASE TAKE FURTHER NOTICE that the Debtors submit herewith no brief or memorandum of law in connection with this motion, there being no disputed questions of law involved. If a disputed question of law should arise on the return date of the motion, the movants further reserve the right to file a brief or memorandum of law in accordance with any timetable set by the Court.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 9013-1(f) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, the Debtors waive oral argument of this motion and will not appear unless required by the Court to appear. This motion may be deemed uncontested if no one files written responses and serves same on counsel for the moving party or more.

A proposed form of Order also accompanies this Motion.

Broege, Neumann, Fischer & Shaver, LLC
Attorneys for Debtors

BY: /s/ Geoffrey P. Neumann
GEOFFREY P. NEUMANN

Dated: April 14, 2022